

**BEFORE THE  
POSTAL RATE COMMISSION**

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POSTAL RATE COMMISSION  
OFFICE OF THE CLERK

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**POSTAL RATE AND FEE CHANGES, 2001**

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**DOCKET NO. R2001-1**

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**INTERROGATORIES OF UNITED PARCEL SERVICE  
TO THE UNITED STATES POSTAL SERVICE  
WITNESS MOELLER  
(UPS/USPS-T28-44 through 50)  
(December 10, 2001)**

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatories directed to United States Postal Service  
Witness Moeller: UPS/USPS-T28-44 through 50.

Respectfully submitted,



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INTERROGATORIES OF UNITED PARCEL SERVICE TO  
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UPS/USPS-T28-44. Refer to library reference USPS-LR-J-89, which compares markups and markup indices by subclass in the PRC's recommended decision in Docket No. R2000-1 with markups and markup indices resulting from the Postal Service's proposed rates in Docket No. R2001-1 under PRC costing and Postal Service costing methodologies. The markups and markup indices are provided separately for First Class Letters and First Class Cards. Provide the markup and markup indices for First-Class Mail in the aggregate.

UPS/USPS-T28-45. Identify all rate categories across all classes of mail that will receive an average rate decrease under the Postal Service's proposed rates. For those rate categories that will receive an average rate decrease, provide the Base Year revenue, Test Year Before Rates revenue, Test Year After Rates revenue, and the size of the rate decrease (in percentage terms) for the rate category.

UPS/USPS-T28-46. Refer to pages 22-26 of your testimony, USPS-T-28, where you apply the ratemaking criteria to Priority Mail. Confirm that transportation legs in the two day service area for Priority Mail are longer than transportation legs for the two day service area in First Class Mail. If not confirmed, explain why not.

UPS/USPS-T28-47. Refer to pages 22-26 of your testimony, USPS-T-28, where you apply the ratemaking criteria to Priority Mail. Confirm that changes in mail mixes within classes, subclasses, and categories of mail can change costs of processing, transporting, and delivering mail. If not confirmed, explain why not.

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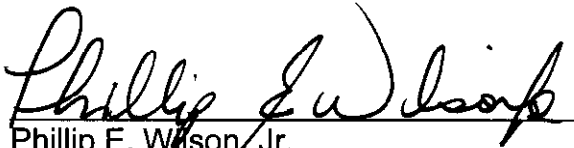
UPS/USPS-T28-48. Refer to pages 22-26 of your testimony, USPS-T-28, where you apply the ratemaking criteria to Priority Mail. Confirm that flats are more difficult to process, transport, and deliver than letter-shaped pieces. If not confirmed, explain why not.

UPS/USPS-T28-49. Refer to pages 22-26 of your testimony, USPS-T-28, where you apply the ratemaking criteria to Priority Mail. Confirm that parcels are more difficult to process, transport, and deliver than flat-shaped pieces. If not confirmed, explain why not.

UPS/USPS-T28-50. Refer to pages 22-26 of your testimony, USPS-T-28, where you apply the ratemaking criteria to Priority Mail. Confirm that Priority Mail on-time performance for flats is greater than First Class Mail on-time performance for flats. If not confirmed, explain why not.

CERTIFICATE OF SERVICE

I hereby certify that on this date I have caused to be served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.

  
Phillip E. Wilson, Jr.

Dated: December 10, 2001  
Philadelphia, PA

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